

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Nilam Patel	:	Chapter 13
	:	Case No.: 19-16366-MDC
Debtor(s)	:	

EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY

Debtor, Nilam Patel, by and through her undersigned counsel bring this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code; and in support thereof aver the following:

1. Debtors commenced the instant Chapter 13 matter on October 10, 2019 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on March 5, 2020.
3. The subject real property is located at 6035 Snapdragon Court, Bensalem, PA (hereinafter referred to as “the property”) and is owned by the Debtor.
4. The Debtor believes it to be in her best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Lisa Desimone of Century 21 Advantage Gold-Yardley.
6. On or about February 3, 2022 , Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$400,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for February 24, 2022.

8. Based on the February 24, 2022 settlement date, an emergency hearing is necessary in this matter.

9. The Buyer, Elite Property Acquisitions, LLC, is not an insider of the Debtor and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.

10. From the sale proceeds the Debtors intend to satisfy the mortgages held by Wells Fargo Bank, along with any other liens on the property.

11. The Debtor is desirous of receiving their full exemption in the sum of up to \$25,150.00 plus any remaining proceeds after all liens and the Chapter 13 Balance is satisfied.

WHEREFORE, Debtors, respectfully request that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtors to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtors such other and further relief to which they may be justly entitled.

Dated: February 9, 2022

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtors
Sadek and Cooper, LLC.
1315 Walnut Street, #502
Philadelphia, PA 19107
215-545-0008